Case 1:17-cr-00779-LAP Document 114 Filed 08/24/18 Page 1 of 2

U.S. Department of Justice

United States Attorney Southern District of New York

> The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

August 24, 2018

BY ECF

The Honorable Loretta A. Preska United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

> Re: United States v. Chi Ping Patrick Ho, 17 Cr. 779 (LAP)

Dear Judge Preska:

The Government respectfully submits this letter in the above-captioned matter on behalf of both parties in regard to the trial scheduled to commence on November 5, 2018. At the conference held on July 19, 2018, the Court directed the parties to confer on a pretrial schedule and to present a proposal to the Court. The parties jointly propose the following schedule:

Expert notice

- o Notice of any expert by either party: disclosure due 9/17/18
- O Notice of any expert to be called in rebuttal to an expert disclosed on or before 9/17/18: disclosure due 10/15/18

• Motions in limine

- o Motions by either party: due 10/2/18
- Oppositions: due 10/12/18
- o Final pretrial conference, including oral arguments if requested by the Court: the parties propose the week of 10/22/18 if convenient for the Court

• Requests to charge and voir dire

- o Government's requests to charge and proposed voir dire: due 10/15/18
- o Defendant's objections and/or additions: due 10/22/18
- Hearing on foreign law pursuant to Federal Rule of Criminal Procedure 26.1: The parties respectfully request that the Court schedule a hearing during the week of 10/22/18 or the week of 10/29/18. The parties will work diligently to reach an agreement on the elements of Chadian and Ugandan anti-corruption laws, which are relevant to the money laundering counts, but if an agreement cannot be reached, the parties believe it may be necessary to hold a hearing at which one or more foreign law experts will testify.

Case 1:17-cr-00779-LAP Document 114 Filed 08/24/18 Page 2 of 2

Honorable Loretta A. Preska United States District Judge August 24, 2018 Page 2

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

By: s/ Douglas S. Zolkind

Daniel C. Richenthal Douglas S. Zolkind Thomas McKay

Assistant United States Attorneys

(212) 637-2109/2418/2268

SANDRA MOSER

Acting Chief, Fraud Section

Criminal Division

By: s/ Paul A. Hayden

David A. Last Paul A. Hayden Trial Attorneys

(202) 616-5651/353-9370

cc: (by ECF)

Counsel of Record